

**Document type:** DOE-Directives**Document:** DOE O 361.1C, Acquisition Career Management Program, Review and Comment**Overall Comments****Major comment from Debra Smiley for Bonneville Power Administration**

The Bonneville Power Administration (BPA) appreciates the opportunity to comment on draft DOE Order 361.1C, Acquisition Career Management Program. BPA has no edits or comments to the draft Order as written. Again, BPA appreciates the opportunity to review and comment on the draft Order.

Response:

Accept Thank you!

Suggested comment from Steve Duarte for Headquarters GC**Included comments:****SME james.jurich@hq.doe.gov**

Paragraphs in the .pdf need to be properly numbered. There are two Paragraphs 1 on the first page causing the following paragraphs in the .pdf version not to be properly numbered.

Suggested comment from Bill Schwartz for Headquarters HG

This package represents the official, consolidated comments of **Poli A. Marmolejos, Director**
No Comment

Suggested comment from Emily Jackson for Headquarters LM

No Comment

Suggested comment from LaVerne Fuller for Headquarters MA

This package represents the official, consolidated comments of **N/A - Comment package automatically submitted.**

No Comment

Suggested comment from Cathy Tullis for Headquarters NA

This package represents the official, consolidated comments of **Cathy Tullis**

Included comments:**Delegate Connie Ayers for NNSA Production Office****Comment from Janice Brashears NPO-Y-12:****Inconsistent Use of Acronyms**

-Acronyms are used prior to being setup/defined (i.e., SACMs is used on page 6 and setup on page 8);

-Acronyms are setup/defined multiple times (i.e., Points of Contact (POC) is set up on page 6 and 8); and,

-Some Acronyms don't appear to be setup/defined in document (i.e., FAI on page 9).

NOTE: There were several examples of each incident, only highlighted once for each.

Response:

Accept Change made.

Delegate Connie Ayers for NNSA Production Office

Comment from Janice Brashears NPO-Y-12: The number of the sections are not chronological, there are two number ones which of course errors the remainder of the sections numbering; also

two consecutive letters: (g) and (h) under Section 4. (Numerous other numbering issues).

Suggested comment from PK Niyogi for Headquarters NE

Included comments:

Jenni Hamilton for Oak Ridge Office-NE

No Comment

SME olsonsm@id.doe.gov

No comments.

SME ADAMSML@ID.DOE.GOV

No Comment

Christie Melbihess for Idaho National Laboratory - NE

No Comment

Suggested comment from Cecelia Kenney for Headquarters AU (formerly HS)

No Comment

Suggested comment from Rauland Sharp for Headquarters HC

This package represents the official, consolidated comments of **N/A - Comment package automatically submitted.**

No Comment

Suggested comment from John Wall for Headquarters CF

No Comment

Suggested comment from Sharon Edge-Harley for Headquarters IEA (Independent Enterprise Assessment)

No Comment

1. PURPOSE; CANCELLATION; APPLICABILITY

Suggested comment from Marilyn Jacobs for Headquarters EM

Included comments:

SME michael.collins1@rl.doe.gov

Capitalize "F" in "the office of federal Procurement Policy...) in paragraph a.

Response:

Accept Suggestion implemented.

Suggested comment from Cathy Tullis for Headquarters NA

Included comments:

Henry Van Dyke for NA-General Counsel

Office of Federal Procurement Policy

Response:

Accept Added

Ken West for NA-Acquisition and Project Management

No period after e.

Response:

Accept Suggestion implemented.

Suggested comment from PK Niyogi for Headquarters NE

Included comments:

SME wagonetl@id.doe.gov

Missing closed " "Federal Procurement **Reform**"

Need capitalization the Office of **Federal** Procurement Policy (OFPP), requirements, and the Federal Acquisition Reform Act (FARA).

On e. need period at end of sentence.**Response:**

Accept Suggestions implemented.

Major comment from Cathy Tullis for Headquarters NA**Included comments:****SME marianna.windes@navy.mil**

Please add the following equivalency to Paragraph 3.c.:

"In accordance with the responsibilities and authorities assigned by Executive Order 12344, codified at 50 USC sections 2406, 2511 and to ensure consistency throughout the joint Navy/DOE Naval Nuclear Propulsion Program, the Deputy Administrator for Naval Reactors (Director) will implement and oversee requirements and practices pertaining to this Directive for activities under the Director's cognizance, as deemed appropriate."

Response:

Accept As requested the Major Comment was added as an equivalency.

4. REQUIREMENTS**Suggested comment from Cathy Tullis for Headquarters NA****Included comments:****Henry Van Dyke for NA-General Counsel**

If the DOE ACMHandbook is electronically accessible, include the appropriate reference/link.

Response:

Accept The handbook is currently being revised. An Acquisition Newsletter article will show when the document will be available on Powerpedia.

Ken West for NA-Acquisition and Project Management

Missing a period after (2)

Response:

Accept

Period included. Thank you!

Suggested comment from Cathy Tullis for Headquarters NA**Included comments:****Henry Van Dyke for NA-General Counsel**

Unless Congress **or the OFPP** enacts a requirement for a new education or training standard and designates it as "continuing education and training," in which case individuals must complete the new requirements of this kind within 36 months.

This addition is to ensure consistency with 41 USC 1122(a)(j) which provides functions to the OFPP Administrator.

Response:

Accept Change was made. Thank you!

Suggested comment from PK Niyogi for Headquarters NE**Included comments:****SME ARENAZMR@ID.DOE.GOV**

The sentence starting with "unless" needs to either be included at the end of the prior sentence or added as an (8). It makes no coherent sense otherwise.

The "Note" should be deleted. Orders should not have "notes" but this is a requirement and should be so stated.

Response:

Accept

Change made--Thank you Mark

Major comment from PK Niyogi for Headquarters NE**Included comments:****SME ARENAZMR@ID.DOE.GOV**

There is a reference to "Continuous Learning Point Guidance" but no reference or link to it. How is the reader supposed to know what that document is or how to find it?

Response:

Accept

Reference to Continuous Learning Point Guidance was included to paragraph 4 d. Continuous Learning; " (For additional information on the application of continuous learning points, review the "Continuous Learning Point Guidance" located on Powerpedia.)."

5. RESPONSIBILITIES**Major comment from PK Niyogi for Headquarters NE****Included comments:****SME ARENAZMR@ID.DOE.GOV**

This whole "a." needs to be deleted. It is not a list of responsibilities but identification of certification programs. Responsibilities should be individual based.

Response:

Accept with Modifications

This section was modified to identify all certifications the ACMP has responsibility for.

Suggested comment from Cathy Tullis for Headquarters NA**Included comments:****Henry Van Dyke for NA-General Counsel**

NOTE: Warrant holders and legacy employees are not limited to 1100 series.

Recommend more specificity, e.g., contracting officer warrant, real estate specialist warrant. The term warrant holders is too vague.

Ken West for NA-Acquisition and Project Management

Recommend removing "certification in" from

iv. 1109--Certification in Financial Assistance

for consistency.

Major comment from PK Niyogi for Headquarters NE**Included comments:****SME ARENAZMR@ID.DOE.GOV**

This whole "b." should be deleted. It is not a Responsibility.

Response:

Accept

Graph in section b. was deleted.

Major comment from Sara Frey for Western Area Power Administration

Paragraph 5b. FAITAS is not configured for Procurement Directors and HCAs to approve only supervisor, BCM (SACM), ACM.

Response:

Accept

Correct, Supervisors, BCMs/SACMs and the ACM can approve training and CLPs in FAITAS.

Suggested comment from PK Niyogi for Headquarters NE**Included comments:****SME ARENAZMR@ID.DOE.GOV**

You use the terms "or equivalent" and "or designee" in this section. They need to be defined or at least include criteria.

Response:

Accept

Mark the change was made to reflect designee.

DOE currently does not have an official CAO on board yet, that's why the designee or equivalent language was used. The intent is to be consistent.

Major comment from PK Niyogi for Headquarters NE**Included comments:****SME ARENAZMR@ID.DOE.GOV**

You use the term "ensure" in a number of the Responsibilities areas. It is not possible for a HQ senior manager to "ensure" that people are certified especially the large and vast DOE acquisition work force. Suggest other wording that includes establishing a process or oversight. I also don't see the SPE role as being unique and appears redundant. Is this position needed?

Response:

Accept

Language changed.

Acquisition Career Managers (ACMs). **Provide oversight** of DOE acquisition certification processes and provide guidance and assistance to meet career development and acquisition certification policy requirements to maintain certifications. For DOE the ACM serves as the Professional Development Chief. ACMs:

Suggested comment from Cathy Tullis for Headquarters NA**Included comments:****Ken West for NA-Acquisition and Project Management**

Rosa Martinez comment: It appears "following" needs to be removed.

Response:

Accept change made

Henry Van Dyke for NA-General Counsel

References throughout 5.e. need to include references to NNSA.

Response:

Accept Added.

Suggested comment from PK Niyogi for Headquarters NE**Included comments:****SME ARENAZMR@ID.DOE.GOV**

Why does the ACM for DOE also hold an additional title as Professional development Chief? There is no other reference to that title in the Order. Suggest deleting.

(1) appears redundant to the CAO role.

(4) can "ensure" this.

(5) remove "following"

Response:

Accept with Modifications

Suggestions 4 & 5 were implemented.

Major comment from Sara Frey for Western Area Power Administration

Paragraph 5e. For DOE elements, who serves as the Acquisition Career Managers? Is it a single role at the Department under SPE?

Response:

Accept

The DOE Acquisition Career Manager (1 person) is appointed by the CAO to lead the Acquisition Career Development efforts within DOE. Site Acquisition Career Managers assist in this process.

Suggested comment from Cathy Tullis for Headquarters NA

Included comments:

Ken West for NA-Acquisition and Project Management

Rosa Martinez comment:

Recommend adding "experience" to (9) along with education and training:

(9) Recommend, as appropriate, to the SPE waivers to FAC education and training requirements.

Delegate Connie Ayers for NNSA Production Office

Comment from Janice Brashears NPO-Y-12: Acronyms are used prior to being setup/defined (i.e., SACMs is used on page 6 and setup on page 8). -Acronyms are setup/defined multiple times (i.e., Points of Contact (POC) is set up on page 6 and 8);

Response:

Accept Change made.

Henry Van Dyke for NA-General Counsel

References throughout 5.e. need to include references to NNSA

Response:

Accept Added.

Suggested comment from PK Niyogi for Headquarters NE

Included comments:

SME wagonetl@id.doe.gov

On (8) spell out SACMs, first time used in document.

On (9) spell out SPE, first time used in document.

Major comment from Sara Frey for Western Area Power Administration

Paragraph 5e(10). Does FAITAS feed into CHRIS? Will CHRIS be used as a training repository?

Response:

Accept

FAITAS does not feed into CHRIS or any other Federal human resources system. It is a stand-alone system.

CHRIS will continue to be DOE's main system to record training for all DOE. FAITAS is strictly for the Federal Acquisition Workforce.

Suggested comment from Cathy Tullis for Headquarters NA

Included comments:

Henry Van Dyke for NA-General Counsel

References throughout 5.e. need to include references to NNSA

Suggested comment from PK Niyogi for Headquarters NE

Included comments:

SME ARENAZMR@ID.DOE.GOV

(12) Doesn't the SACMs do this now rather than the ACMs? Delete.

(13) the ACMs do not do this for individuals. This is the SACMs job. delete.

Suggested comment from Cathy Tullis for Headquarters NA

Included comments:

SME JoAnn.Wright@nnsa.doe.gov

Refer to paragraph f.(1)(e) and the words "as appropriate" at the end of the statement.

SME JoAnn.Wright@nnsa.doe.gov

Refer to paragraph f(1)(d). The NNSA HCA is part of HQ so the HCA would not forward the waiver requests to HQ.

Ken West for NA-Acquisition and Project Management

Rosa Martinez comment:

It appears you need to remove "functional advisors" from:

1) Promote technical excellence in assisting the SPE on career management issues in the various disciplines. Specifically, functional advisors:

Major comment from PK Niyogi for Headquarters NE

Included comments:

SME ARENAZMR@ID.DOE.GOV

f. needs to be rethought and rewritten. The title is for HCAs but the responsibilities are for "functional advisors". Different people.

(d) and (e) - is this a HCA responsibility or a SACM?

Response:

Accept with Modifications This section has been modified to reflect HCAs responsibilities in career development. Functional advisors no longer exist. Thank you for the identification of a mistake.

Major comment from Sara Frey for Western Area Power Administration

Paragraph 5f(1)(d). How is the HCA to review certification requests when they go through FAITAS?

Response:

Accept HCAs should see and approve certification requests prior to requests being entered in FAITAS.

Suggested comment from Cathy Tullis for Headquarters NA

Included comments:

Delegate Connie Ayers for NNSA Production Office

Comment from Janice Brashears NPO-Y-12: In Responsibilities, it was noted that "providing funding" is reflected three times with #2 and #4 being almost identical - consider consolidation of

point.

Henry Van Dyke for NA-General Counsel

(1) Ensure that existing acquisition staff and managers receive continuous training learning to keep current on emerging acquisition laws, regulations, requirements, policies, procurement issues, and techniques other requirements.

Suggested comment from PK Niyogi for Headquarters NE

Included comments:

SME ARENAZMR@ID.DOE.GOV

- (1) I still have a problem with the word "ensure" in this document.
- (3) if you reference another document, provide a link or reference location.

Suggested comment from Cathy Tullis for Headquarters NA

Included comments:

Delegate Connie Ayers for NNSA Production Office

Comment from Janice Brashears NPO-Y12: two consecutive letters: (g) under Section 4 (Responsibilities).

Suggested comment from PK Niyogi for Headquarters NE

Included comments:

SME ARENAZMR@ID.DOE.GOV

(a) SACMs can't "ensure". They are not supervisors, they manage a process. Add the word "are" after "members"

Response:

Accept

Changed.

Provide guidance, oversight and assistance to certified acquisition workforce members so members maintain required certification levels under their respective career development modules

Major comment from Sara Frey for Western Area Power Administration

Paragraph 5g(1)(b). Currently certification status of FAC-C is reported semi-annually as part of the Balanced Scorecard critical few. Recommend ACM generate reports as necessary.

Response:

Accept The ACM will generate reports on FAC-C as required.

Suggested comment from Cathy Tullis for Headquarters NA

Included comments:

SME JoAnn.Wright@nnsa.doe.gov

Refer to paragraph 3.(i). Change the word electives to courses so it reads mandatory courses rather than mandatory electives.

Ken West for NA-Acquisition and Project Management

Rosa Martinez comment:

Suggest adding "and or DOE" after FAI:

(c) Ensure applications or other actions are completed, fully supported and are aligned with FAI standards.

Delegate Connie Ayers for NNSA Production Office

Comment from Janice Brashears NPO-Y-12: Some Acronyms don't appear to be setup/defined in document (i.e., FAI on page 9).

Suggested comment from PK Niyogi for Headquarters NE

Included comments:**SME ARENAZMR@ID.DOE.GOV**

(i) and (j). Problems with the word "ensure". Don't understand the phrase "outstanding DOE mandatory electives". Please rewrite.

(j) This is a requirement for certification, not a responsibility. Delete.

Major comment from Sara Frey for Western Area Power Administration

Paragraph 5g(3)(d). What role, if any, does CHRIS play in certification oversight?

Response:

Reject CHRIS is strictly for all forms of training, but mostly mandatory, leadership, communication, and other than acquisition skills training.

Suggested comment from PK Niyogi for Headquarters NE**Included comments:****SME ARENAZMR@ID.DOE.GOV**

(a) seem like an unlikely responsibility. This is not being done now. Why is it a requirement?

Suggested comment from Cathy Tullis for Headquarters NA**Included comments:****SME michael.gilmore@nnsa.doe.gov**

Technically speaking, IDPs can't "complete requisite certification requirements", they only plan for activities to complete them. Suggest rewording to clarify this.

The list of options, even though prefaced by "include but not limited to" tends to leave out discussion of other means of meeting the certification requirements, even with the explicit statement of rotational assignments. Suggest amending to read "plans may include, among other activities, course, rotational assignments, self-study and other means of meeting certification requirements."

Major comment from Sara Frey for Western Area Power Administration

Paragraph 5h. Will acquisition be using the template DOE IDP or is there a different template used through FAITAS?

Response:

Accept with Modifications FAITAS has an interactive IDP that could be used.

Major comment from PK Niyogi for Headquarters NE**Included comments:****SME ARENAZMR@ID.DOE.GOV**

(8) is redundant with (1). Delete.

Response:

Accept

Thank you Mark,

The change was made.

Suggested comment from Cathy Tullis for Headquarters NA**Included comments:****Delegate Connie Ayers for NNSA Production Office**

Comment from Janice Brashears NPO-Y12: two consecutive letters: (h) under Section 4 (Responsibilities).

Response:*Accept* Chjange made.**Suggested comment from PK Niyogi for Headquarters NE****Included comments:****SME ARENAZMR@ID.DOE.GOV**

h.should be i.

Response:*Accept* change made**Suggested comment from Jennifer Kelley for Headquarters SC**

Paragraph 5h(4) and 5(i). In the PDF version, there appears to be a space missing between line 5h(4) and line 5i.

Suggested comment from Cathy Tullis for Headquarters NA**Included comments:****Delegate Connie Ayers for NNSA Production Office****Comment from Janice Brashears NPO-Y-12:** There were areas where the spacing could be adjusted (i.e., insert line before the Responsibilities, Human Capital section) as well as the alignment of page numbers in p 20 Table of Contents.**Ken West for NA-Acquisition and Project Management**

Rosa Martinezn comments:

Missing a period after Item (2) and should be a paragraph break before i. Human Capital.

Also, before "revoked" it appears it needs "and" such as "...and are revoked..." in the following:

Assist in the reassignment of workforce members to duties not requiring certification when their certifications expire are revoked for failure to obtain continuous learning.

Suggested comment from PK Niyogi for Headquarters NE**Included comments:****SME wagonetl@id.doe.gov**

On (3) - Sentence needs re-worded, it appears the word "or" is missing.

SME ARENAZMR@ID.DOE.GOV

i. should be j.

Major comment from Sara Frey for Western Area Power Administration

Paragraph 5i. In this section, does Human Capital refer to HQ HC or sub-element/entity support HR offices? If referring to field site HR offices, recommend the acquisition office play a larger role in conducting these studies and workforce planning. HR may be a support function to help facilitate the process and planning, but not own the responsibility.

Response:*Accept* Human Capital does refer to HR HQ and all other sub-element support HR Offices. However, HQ HC is the main governing body.**6. REFERENCES****Suggested comment from Steve Duarte for Headquarters GC****Included comments:****SME james.jurich@hq.doe.gov**

Subparagraphs 6(c) and 6(d) refer to Section 1703 and 1704 respectively but don't identify the statute or other provision to which they belong. Need to clarify and say Section 1703 of XX or XX USC 1703.

Suggested comment from PK Niyogi for Headquarters NE

Included comments:**SME wagonetl@id.doe.gov**

On h. - Consider re-wording it, the start of the sentence is unclear.

Suggested comment from Cathy Tullis for Headquarters NA**Included comments:****Henry Van Dyke for NA-General Counsel**

FAR 1.603-1--requires agency heads to establish and maintain a career management program and a system for the selection, appointment and termination of contracting officers. The selections and appointments must be consistent with links the selection and appointment of contracting officers to OFPP standards that require of skill-based training for contracting and purchasing duties.

Response:*Accept* Suggested comment included.**Suggested comment from PK Niyogi for Headquarters NE****Included comments:****SME ARENAZMR@ID.DOE.GOV**

o. and p. are not Directives and should be deleted from this section.

Response:*Reject*

Correct, both o. & p. are not directives, however they provide valuable career development and career management information for all Federal Acquisition Personnel references. In addition, this section applies to references only.

Major comment from Cathy Tullis for Headquarters NA**Included comments:****Ken West for NA-Acquisition and Project Management**

Disagree with inclusion of the DOE Acquisition Guide - it is not a regulation nor a "directive".

Response:*Accept with Modifications* Agreed, however it is a reference for all acquisition personnel within DOE.**7. DEFINITIONS****Suggested comment from Cathy Tullis for Headquarters NA****Included comments:****Henry Van Dyke for NA-General Counsel**

Reference to NNSA should be included in 7.e.

Suggested comment from PK Niyogi for Headquarters NE**Included comments:****SME ARENAZMR@ID.DOE.GOV**

On page 6, the ACM is called the Professional Development Chief and a different title here. There needs to be consistency.

Major comment from Cathy Tullis for Headquarters NA**Included comments:****Ken West for NA-Acquisition and Project Management**

Acquisition Guide - "serves" should be removed. However, it is not a mandatory document, but a

guide, and therefore the "to be followed" is misleading. Suggest this be revised to, "...to be used as guidance by both procurement and program personnel..."

Response:

Accept

Good catch Ken,

The change was made.

Very respectfully,

Suggested comment from Cathy Tullis for Headquarters NA

Included comments:

Henry Van Dyke for NA-General Counsel

Reference to NNSA employees should be added in 7.i.

Suggested comment from PK Niyogi for Headquarters NE

Included comments:

SME wagonetl@id.doe.gov

On g. - Re-word first sentence it appears the word "and" should be added after serves "The DOE Acquisition Guide serves and identifies.

On h. - Those with duties that fall in the acquisition category in both Headquarters and [filed] Should "filed" be field? organizations.

Suggested comment from Cathy Tullis for Headquarters NA

Included comments:

Henry Van Dyke for NA-General Counsel

Reference to NNSA should be included in 7.k.

Ken West for NA-Acquisition and Project Management

Rosa Martinez comment;

k. There is no "Acquisition Position Categories" above. Either remove the sentence or identify the career fields.

Delegate Connie Ayers for NNSA Production Office

Comment from Janice Brashears NPO-Y-12: In Definitions, the Career Field (letter K) reflects that ...7 career fields are identified above in "Acquisition Position Categories"... - but couldn't be located.

SME michael.gilmore@nnsa.doe.gov

I don't see Acquisition Position Categories identified above in this section.

Major comment from PK Niyogi for Headquarters NE

Included comments:

SME ARENAZMR@ID.DOE.GOV

k. There are no "Acquisition Career Position Categories" identified anywhere above in the document. Research and provide correct reference or delete.

Response:

Accept

Point taken. Deleted.

Suggested comment from Cathy Tullis for Headquarters NA**Included comments:**

Henry Van Dyke for NA-General Counsel
Reference to NNSA should be included in 7.o.

Suggested comment from Cathy Tullis for Headquarters NA**Included comments:**

Henry Van Dyke for NA-General Counsel
Reference to NNSA should be included in 7.r.

Response:
Accept

NNSA included.

Suggested comment from PK Niyogi for Headquarters NE**Included comments:**

SME ARENAZMR@ID.DOE.GOV
p. Delete the last sentence. So what? Not part of a definition.

Response:
Accept

Change made.

Suggested comment from Jennifer Kelley for Headquarters SC

Paragraph 7p. Add the word "are" to the last sentence ("There are four levels...")

Suggested comment from Cathy Tullis for Headquarters NA**Included comments:**

Henry Van Dyke for NA-General Counsel

Contracting Officer (CO). A contracting officer is a Government employee who has the authority to award, administer or terminate a contract above the micropurchase threshold. The term "warranted contracting officer" encompasses persons having the authority to award or administer contracts above the micropurchase threshold.

In place of this broad definition, suggest using the definition contained in FAR 2.101.

Suggested comment from Cathy Tullis for Headquarters NA**Included comments:**

Ken West for NA-Acquisition and Project Management

Continuous learning point is out of alphabetical order. Also, there is a comma at the end of "peer reviews" that needs to be removed.

Henry Van Dyke for NA-General Counsel

. Contracting Officer's Representative (COR). A Government employee formally designated to act as an authorized representative of a contracting officer for specified **technical and administrative** functions that do not include actions that could change the scope, price, terms or conditions of a contract (e.g., technical monitoring).

Ken West for NA-Acquisition and Project Management

Rosa Martinez comment: suggest adding "etc." after peer reviews since this is not all inclusive.

Suggested comment from PK Niyogi for Headquarters NE

Included comments:**SME wagonetl@id.doe.gov**

On w. - end of sentence needs period only.

Suggested comment from Jennifer Kelley for Headquarters SC

Paragraph 7w. The paragraph needs editing ("Peer Review, .") Suggest adding ", etc."

Suggested comment from Cathy Tullis for Headquarters NA**Included comments:****Ken West for NA-Acquisition and Project Management**

Rosa Martinez comment:

ee. has a duplicate "the development"-

Suggested comment from PK Niyogi for Headquarters NE**Included comments:****SME wagonetl@id.doe.gov**

On ee. - "the development" is duplicated in sentence.

Suggested comment from Cathy Tullis for Headquarters NA**Included comments:****Henry Van Dyke for NA-General Counsel**

References to NNSA should be included in 7.gg and 7.ii

Suggested comment from Cathy Tullis for Headquarters NA**Included comments:****Ken West for NA-Acquisition and Project Management**

Since FA is defined below this in the document, suggest spelling it out in kk. However, we don't believe this is a true statement any longer so recommend removal of the sentence.

Suggested comment from PK Niyogi for Headquarters NE**Included comments:****SME ARENAZMR@ID.DOE.GOV**

II. So who is this individual? Not in the Responsibilities section. Delete.

Response:*Accept*

HCA included in responsibilities.

Suggested comment from Cathy Tullis for Headquarters NA**Included comments:****Henry Van Dyke for NA-General Counsel**

Reference to NNSA should be included in 7.oo

Suggested comment from Cathy Tullis for Headquarters NA**Included comments:****Henry Van Dyke for NA-General Counsel**

Reference to NNSA should be included in 7.ss

Suggested comment from Cathy Tullis for Headquarters NA

Included comments:

Henry Van Dyke for NA-General Counsel

Reference to NNSA should be included in 7.uu.

Revise 7.ww as follows: For the purpose of this Order, statutory requirements are those requirement enacted into Federal law and docified for Federal procurement and acquisition-related purposes, as well as Financial Assistance.

Suggested comment from PK Niyogi for Headquarters NE

Included comments:

SME ARENAZMR@ID.DOE.GOV

yy. Why would a SME only be limited to a HQ individual? Add Field.

Suggested comment from Cathy Tullis for Headquarters NA

Included comments:

Delegate Connie Ayers for NNSA Production Office

Comment from Janice Brashears NPO-Y-12: There were areas where the spacing could be adjusted (i.e., insert line before the Responsibilities, Human Capital section) as well as the alignment of page numbers in p 20 Table of Contents.

Response:

Accept Spacing adjusted.

Suggested comment from PK Niyogi for Headquarters NE

Included comments:

SME ARENAZMR@ID.DOE.GOV

I am not an expert in document format but it seems odd to have a TOC so far back in this document. You have a TOC at page 20? Suggest a reorganization of the document.

Response:

Reject

Mark,

I fully understand, however this is in accordance with DOE Order, Departmental Directives 251.1C.

CHAPTER I. FEDERAL ACQUISITION CERTIFICATIONS (FAC)

Suggested comment from PK Niyogi for Headquarters NE

Included comments:

SME wagonetl@id.doe.gov

Capitalize Federal Acquisition Certification programs

Major comment from Cathy Tullis for Headquarters NA

Included comments:

Ken West for NA-Acquisition and Project Management

Rosa Martinez comment:

2.a.(2) A new OFPP memo was issued May 7, 2014 which appears to change this o subject Revisoins to the FAC-C. We recommend revising 2.a.(2) to use the lanaguge in Atch 1 of that May 7 memo, under paragraph under 5. Applicability:

"The Federal certification in contracting is not mandatory for all contracting professionals; however, members of the workforce holding Contracting Officer (CO) warrants as of the effective date of this certification program, regardless of GS series, and other contracting professionals in the 1102 job series must be certified at an appropriate level, pursuant to agency policy."

Response:

Accept

That information will be added.

Thank you Rosa.

Very respectfully,

Gregory

Suggested comment from PK Niyogi for Headquarters NE

Included comments:

SME wagonetl@id.doe.gov

Capitalize Acquisition and Certification - ROLES AND RESPONSIBILITIES. The DOE ACM is responsible for implementing general training, experience and development requirements established by OFPP for the following Federal acquisition certification programs:

Major comment from Sara Frey for Western Area Power Administration

Paragraph 2a(2). IAW ACP Handbook 5th Edition draft Chapter 5, Overview para. 3 FAC-C is required for all employees occupying GS-1102 positions.

Response:

Reject

This language will be included in the

- (1) The GS-1102 federal acquisition certification is not mandatory for all GS-1102s. However, members of the acquisition workforce issued new CO warrants on or after January 1, 2007, regardless of GS series must be certified at an appropriate level to support their warrant obligations.

In accordance with the Draft Handbook that is still under revision.

Certification is a mandatory for contracting officers based on delegated (warrant) authority, as follows:

<u>Award Type</u>	<u>Federal Certification</u>	<u>DOE Certification</u>
Contracting	FAC-C	
Change Orders[1]	FAC-C modified ²	
Simplified Acquisitions	Purchasing	
Financial Assistance		CFA
Real Estate		Certified Realty Specialist

[1] Covers Resident Engineer warrants (WAPA only) for designated construction contracts; see Section IV

CHAPTER II. CONTRACTING AND PURCHASING CAREER DEVELOPMENT PROGRAM

Suggested comment from Cathy Tullis for Headquarters NA

Included comments:**Ken West for NA-Acquisition and Project Management**

Rosa Martinez comment:

Contracting and Purchasing are two different curriculums. We feel the FAC-C program should be a separate chapter, like chapter VI for CORs and chapter VII for FAC PPM. Perhaps first identify each of the FAC programs after Chapter 1, beginning with FAC-C as Chapter II, FAC-COR as Chapter III (vice Chapter VI), and FAC PPM as Chapter IV (vice Chapter VII). Then Chapter V would be Purchasing; Chapter VI would be Personal Property Management; Chapter VII would be Financial Assistance; Chapter VIII would be PMDCP.

Suggested comment from PK Niyogi for Headquarters NE**Included comments:****SME ARENAZMR@ID.DOE.GOV**

CPCD should be in the Definitions section

Suggested comment from Steve Duarte for Headquarters GC**Included comments:****SME james.jurich@hq.doe.gov**

Paragraph 3b, second sentence is not clear to who or what it refers to. It should read: "Certified 1105's to Level III..." or something similar.

Suggested comment from Cathy Tullis for Headquarters NA**Included comments:****SME audrey.rischbieter@nnsa.srs.gov**

Suggest the language in 3.a.(3) be changed to read, "An individual hired from another agency with a FAC-C or DAWIA certification must meet DOE-specific requirement and will have two years from the date of hire to obtain DOE required training."

Requiring all DOE specific training for a FAC-C two years from the date that a DAWIA certification was issued is not feasible. Although 1102s in DOD agencies are required to obtain 40CLPs on an annual basis, DAWIA certifications are not updated once they have been issued.

For example: An employee is issued a DAWIA Certification in 2010 and transfers to DOE in 2014.

This employee has certificates supporting the annual 40CLP requirement from 2010-2014 but the DAWIA certification document still reflects the original issuance date of 2010. As this order is currently written, it would require the transferred employee to have all DOE specific courses completed in 2012 (2 years from the date of DAWIA Certification date of 2010). Since the employee didn't transfer to DOE until 2014 it wouldn't be possible to fulfill the training requirements before they were even employed by the agency.

Changing this section to complete the required DOE courses within 2 years of being hired by DOE would be consistent with the requirements for 1102s in other agencies.

Major comment from PK Niyogi for Headquarters NE**Included comments:****SME ARENAZMR@ID.DOE.GOV**

(4) is redundant to 3.a.(2). Delete.

Response:

Accept Done.

Suggested comment from PK Niyogi for Headquarters NE

Included comments:**SME ARENAZMR@ID.DOE.GOV**

First use of "CL/CE". It needs to be defined.

SME ARENAZMR@ID.DOE.GOV

(3) should this be two years from the date of hire to DOE? This appears to be too restrictive if the individual received the certification two years prior to coming to DOE.

Response:

Accept changed

Major comment from Sara Frey for Western Area Power Administration

Paragraph 3a(3). The requirement to complete DOE required training in 2 years conflicts with the 18 month requirement in the ACP Handbook.

Response:

Accept

We will revisit this issue.

The 2-year requirement is a requirement for new employees coming to DOE.

Suggested comment from Cathy Tullis for Headquarters NA**Included comments:****Ken West for NA-Acquisition and Project Management**

Rosa Martinez comment:

We think the OFPP Policy Letter reference should be a reference to the OMB / OFPP memorandum dated Jan 20, 2006. Most recently it was updated on May 7, 2014, so that listed as another update after Dec 2008.

SME audrey.rischbieter@nnsa.srs.gov

What is the biennial refresher training and how does it relate to the requirement to obtain 40 CLPs in order to maintain a contracting certification?

Ken West for NA-Acquisition and Project Management

Rosa Martinez comment:

Similar to the other chapters, we feel this should be titled, "Relation to other Acquisition Workforce Programs."

In addition, this doesn't seem to address the "relation to other acquisition workforce programs." Paragraph 4 under Chapter VII, FAC PPM, actually does explain how that program relates to other acquisition workforce programs, so it seems the other chapters' ending paragraph (i.e. "relation to other Acq Workforce Program paragraph) should be similarly worded.

For example, it would be helpful if this explained that having a FAC- C "is considered to have met the FAC COR requirements for level II. A valid valid, current FAC-C Level III is considered to have met the FAC-COR requirements for Level III. An individual with FAC COR certification does not necessarily meet the requirements for the FAC-C." which is located on page Atch 1 page A-7 of the OFPP memo of May 7, 2014 under paragraph i., Reciprocity with other certifications.

Suggested comment from PK Niyogi for Headquarters NE**Included comments:****SME ARENAZMR@ID.DOE.GOV**

last sentence should be under Chapter II.3.a and not here.

CHAPTER III. PERSONAL PROPERTY MANAGEMENT CAREER DEVELOPMENT PROGRAM**Suggested comment from Cathy Tullis for Headquarters NA****Included comments:**

Ken West for NA-Acquisition and Project Management

Rosa Martinez Comment:

Recommend, similar to the introduction to the chapter on Financial Assistance, you add, "Certification requirements are located in the DOE Acquisition Certifications Handbook."

Suggested comment from PK Niyogi for Headquarters NE**Included comments:**

SME ARENAZMR@ID.DOE.GOV

This responsibility is not listed in the Responsibilities section. Add to it there.

Major comment from PK Niyogi for Headquarters NE**Included comments:**

SME ARENAZMR@ID.DOE.GOV

This section is useless. Either list the requirements or reference the Acquisition Certification handbook.

Response:

Reject

The DOE Acquisition Career Management is responsible for providing career development opportunities to all DOE acquisition personnel.

Major comment from PK Niyogi for Headquarters NE**Included comments:**

SME ARENAZMR@ID.DOE.GOV

I don't undersatnd the need for this section at all. It serves no purpose. Delete.

Response:

Reject The SPE is responsible for implementing this section cannot be deleted, considering acquisition career management is applicable to all property personnel management within DOE.

DOE/National Nuclear Security Administration (NNSA) Personal Property Management Career Development (PPMCD) Program is a mandatory certification program.

CHAPTER IV. FINANCIAL ASSISTANCE CAREER DEVELOPMENT PROGRAM**Major comment from PK Niyogi for Headquarters NE****Included comments:**

SME ARENAZMR@ID.DOE.GOV

Several references are made to the DOE Acquisition Certification Handbook. The Handbook does not serve as a Order and is not a requirement. How do you justify the requirements in the Handbook but not in the Order?

Response:

Accept

The DOE Acquisition Certification Handbook is the main document for certifications. DOE Order 361.1 is the main document for Acquisition Career Management.

Suggested comment from Cathy Tullis for Headquarters NA**Included comments:**

Ken West for NA-Acquisition and Project Management

Rosa Martinez comment:

"Detailed course descriptions are provided in the Acquisition Certifications Program Handbook," is no longer true.

Suggested comment from PK Niyogi for Headquarters NE

Included comments:

SME wagonetl@id.doe.gov

4. Second sentence.. Should CAF be CFA?

Suggested comment from Jennifer Kelley for Headquarters SC

Paragraph 4, second sentence. Change "CAF" to "CFA."

CHAPTER V. PROJECT MANAGEMENT CAREER DEVELOPMENT PROGRAM

Suggested comment from Cathy Tullis for Headquarters NA

Included comments:

Ken West for NA-Acquisition and Project Management
CEG should be spelled out in this paragraph.

Response:

Accept change made.

Henry Van Dyke for NA-General Counsel
Reference to NNSA should be included.

Suggested comment from PK Niyogi for Headquarters NE

Included comments:

SME ARENAZMR@ID.DOE.GOV
Capitalize federal project director.

Major comment from PK Niyogi for Headquarters NE

Included comments:

SME ARENAZMR@ID.DOE.GOV

a. add "Federal" between "Project" and "Directors".

I understand that this should be only related to the FPD acquisition responsibilities but is not consistent with DOE O 413.3B and needs to be reconsidered.

(3) Is not a R&R

(4) Is not a R&R anywhere.

Response:

Accept This area will be reconsidered. Thank you.

Suggested comment from Cathy Tullis for Headquarters NA

Included comments:

Henry Van Dyke for NA-General Counsel
Reference to NNSA should be included.

Major comment from PK Niyogi for Headquarters NE

Included comments:**SME ARENAZMR@ID.DOE.GOV**

Need to discuss the reciprocity of FPD certification and FAC-COR certification

Response:

Accept

Linda Ott will discuss.

SME ARENAZMR@ID.DOE.GOV

Need to discuss the relationship with FAC-P/PM

Response:

Accept Linda Ott will discuss.

Major comment from PK Niyogi for Headquarters NE**Included comments:****SME ARENAZMR@ID.DOE.GOV**

I would like to understand why this section was the only one carried over from 361.1B for PMCDP? No one in the Department gets this incentive anyhow.

Response:

Accept We can discuss with Linda Ott. Maybe it can be deleted, considering it could fall under human capital.

CHAPTER VI. FAC - CONTRACTING OFFICER'S REPRESENTATIVE CAREER DEVELOPMENT PROGRAM**Major comment from Cathy Tullis for Headquarters NA****Included comments:****Ken West for NA-Acquisition and Project Management**

We disagree that this should state that Task monitors are CORs. It is understood that this language was taken from an OFPP memo, but that memo was not law or regulation, so we feel we can deviate from the OFPP memo. We would like to have the last sentence deleted.

Response:

Accept with Modifications

OFPP provides guidance and direction to the Federal Acquisition Workforce based on statutory requirements outlined in 41 U.S.C. Congress has provided the following statutory requirements

Understandable this could mean something different for NNSA. Could you provide me with acceptable language that may exclude NNSA?

Suggested comment from Cathy Tullis for Headquarters NA**Included comments:****Ken West for NA-Acquisition and Project Management**

Rosa Martinez Comment:

Recommend, similar to the introduction to the chapter on Financial Assistance, you add, "Certification requirements are located in the DOE Acquisition Certifications Handbook."

Major comment from Sara Frey for Western Area Power Administration

Paragraph 1. Under the definition in FAR 2.101, "Contracting officer's representative (COR)" means an individual designated in writing by the CO to perform specific technical or administrative functions. TMs and others who ensure proper development of requirements are not technically CORs as they would have to be appointed as such by a CO to a specific contract.

Response:

Accept with Modifications Understandable, we will make the adjustment.

Major comment from Sara Frey for Western Area Power Administration

Paragraph 2. Why is it necessary to have the COR's supervisor sign each appointment letter when the supervisor has already signed the DOE nomination form to become a COR? Is the requirement to have a critical element in performance plans for CORs and their supervisors going to be coordinated through DOE HR?

Response:

Reject The appointment letter is designated by the FAR, the nomination form is a DOE requirement.

Suggested comment from Cathy Tullis for Headquarters NA**Included comments:****Ken West for NA-Acquisition and Project Management**

Rosa Martinez comment:

This doesn't seem to address the "relation to other acquisition workforce programs." Paragraph 4 under Chapter VII, FAC PPM, actually does explain how that program relates to other acquisition workforce programs, so it seems the other chapters' ending paragraph (i.e. "relation to other Acq Workforce Program paragraph) should be similarly worded.

CHAPTER VII. FAC--PROGRAM/PROJECT MANAGEMENT (P/PM) PROGRAM**Suggested comment from Cathy Tullis for Headquarters NA****Included comments:****Ken West for NA-Acquisition and Project Management**

Rosa Martinez comment:

This appears to be referencing the OFPP memo dated Dec 16, 2013, and may have been copied from that. However, it references an attachment 4 which is not part of this document. It also refers to "core-plus specialization" without any context or previous mention. This paragraph is not consistent with the other "career path curriculum", e.g. under Chapter IV and Chapter V. Should be rewritten to be consistent with the career path curriculum for FAC PPM and not specific to the IT core-plus specialization.

CHAPTER VIII. PURCHASE CARD PROGRAM**Suggested comment from Cathy Tullis for Headquarters NA****Included comments:****Ken West for NA-Acquisition and Project Management**

Rosa Martinez comment:

We are not sure of the intent of this sentence - it is unclear - it is also potentially misleading.

Major comment from Sara Frey for Western Area Power Administration

Paragraph 3. Recommend paragraph 3 be deleted. Being a purchase cardholder does not provide individuals with other career opportunities in the 1102 or 1105 series.

Response:

Accept with Modifications Will make a modification to the language.

Suggested comment from Cathy Tullis for Headquarters NA**Included comments:****Ken West for NA-Acquisition and Project Management**

Rosa Martinez comment:

We are not sure of the intent of this sentence - it is unclear - it is also potentially misleading. Do

they have to comply with the FAC programs?

Major comment from Sara Frey for Western Area Power Administration

Paragraph 4. Recommend paragraph 4 be deleted. Not maintaining a contracting or purchasing certification should not impact cardholders with purchase card authority up to \$3K.

Response:

Accept with Modifications Will make a modification to the language.

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